

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

HINO MOTORS MANUFACTURING  
U.S.A, INC.,

Plaintiff,

v.

CHRIS HETMAN,

Defendant.

Case No.: 2:20-cv-10031

**Consent Motion for Extension of Time**

Plaintiff Hino Motors Manufacturing U.S.A., Inc., through counsel and with Defendant's consent, moves for an extension of time to file its opening brief requesting an award of damages. Specifically, Hino requests an additional ten (10) days to file its opening brief, and for the remaining deadlines to be moved by ten days to match. Hino submits that good cause exists for such an extension for the following reasons:

Pursuant to the Court's briefing schedule, Hino's opening brief is currently due on February 28, 2022. (D.E. 72.) Attorney J. Michael Honeycutt, lead counsel for Hino in this matter, will be out of the office next week on an unrelated matter. Additionally, undersigned counsel for Hino has conferred with counsel for Defendant Hetman, Attorney Russell D. Brown, regarding this motion. Mr. Brown stated that Defendant Hetman does not oppose this motion. Therefore, for convenience of counsel and the parties, Hino requests that the Court modify the briefing schedule to set the following new deadlines:

- Plaintiff's opening brief: March 10, 2022
- Defendant's response brief: April 11, 2022
- Plaintiff's reply brief: April 25, 2022

- Status conference: May 9, 2022

These deadlines reflect extensions of ten days with extra days accounting for deadlines falling on a weekend day. *See* Fed. R. Civ. P. 6(a)(1)(c). The parties would still plan to meet and confer after Plaintiff files its reply brief, consistent with the briefing schedule's instruction.

For the reasons discussed above, Hino requests that the Court grant its extension motion. Hino has included a proposed order along with this motion.

Filed February 18, 2022.

Respectfully submitted,

/s/ Benjamin S. Morrell

J. Michael Honeycutt (MI Bar # P60517)

Benjamin S. Morrell (TBPR # 35480)

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**Certificate of Service**

I hereby certify that on the date listed below, the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which will serve it on the attorneys of record.

Date: February 18, 2022.

/s/ Benjamin S. Morrell  
Benjamin S. Morrell  
*Attorney for Plaintiff*